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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

VIACOM INTERNATIONAL INC., ET AL.

Plaintiffs,

v.

YOUTUBE, INC., ET AL.

Defendants.

CASE NO.: 3:08-MC-80129-SI

[Case No. 07-cv-02103 (LLS) in the
U.S. D.C., S.D.N.Y.]

**[PROPOSED] ORDER AND
STIPULATION FOR AN
EXTENSION OF TIME TO
PRODUCE DOCUMENTS**

THE FOOTBALL ASSOCIATION PREMIER
LEAGUE LIMITED, ET AL.,

Plaintiffs,

v.

YOUTUBE, INC., ET AL.

Defendants.

1 WHEREAS on August 18, 2008, in response to the Motion to Compel Production of
 2 Documents Pursuant to Subpoenas filed by Viacom International Inc. et al., and The Football
 3 Association Premier League Limited, et al. ("Plaintiffs"), this Court ordered Artis Capital
 4 Management L.P., Sequoia Capital Operations LLC, and TriplePoint Capital LLC
 5 ("Respondents") to produce certain documents ("Ordered Documents") by October 2, 2008
 6 "unless [P]laintiffs and [R]espondents agree to a different deadline";

7 WHEREAS the volume of data Respondents have been obligated to restore from back-up
 8 tapes and review in connection with the production of Ordered Documents makes meeting the
 9 Court-ordered deadline of October 2, 2008 impracticable;

10 WHEREAS Respondents need to and through October 27, 2008 to finalize their review
 11 and preparation of the Ordered Documents for production;

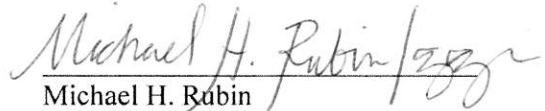
12 WHEREAS Respondents have agreed to produce documents responsive to all of the
 13 requests as to which Plaintiffs and Respondents had previously reached agreement, up to
 14 November 13, 2006 ("Agreed Upon Documents") by not later than September 26, 2008;

15 WHEREAS Respondents will use best efforts to produce a complete privilege log
 16 contemporaneously with production of the Ordered Documents, or as shortly thereafter as
 17 possible;

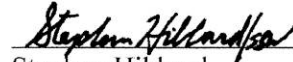
18 THEREFORE: The parties stipulate that (1) the deadline for Respondents' production of
 19 Agreed Upon Documents shall be September 26, 2008; and (2) the deadline for Respondents'
 20 production of the Ordered Document shall be moved from October 2, 2008 to October 27, 2008.

21 IT IS SO STIPULATED.

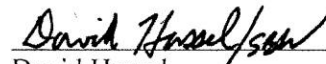
22 Date: Sept. 19, 2008


 Michael H. Rubin
 Attorneys for Non-Parties

24 Date: SEPT. 19, 2008


 Stephen Hibbard
 Attorneys for Viacom Plaintiffs

27 Date: SEPT. 19, 2008


 David Hassel
 Attorneys for Premier League Plaintiffs

[PROPOSED] ORDER

Good cause appearing, IT IS HEREBY ORDERED that (1) the deadline for Respondents' production of Agreed Upon Documents shall be September 26, 2008; and (2) the deadline for Respondents' production of Ordered Documents shall be moved from October 2, 2008 to October 27, 2008.

SO ORDERED.



Judge Susan Illston